

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS**

CINDI DEGEYTER, individually and
on behalf of all other similarly situated,

Plaintiff,

v.

ELDERCARE INSURANCE SERVICES INC.,
an Arkansas registered corporation and
INTEGRITY MARKETING GROUP LLC, a
Texas registered company

Defendants.

Case No. 6:20-cv-06015-RTD

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

MOTION FOR ADMISSION PRO HAC VICE

COMES NOW, Livia M. Kiser, and for her motion requesting admission *pro hac vice*, pursuant to Local Rule 83.5(d), states:

1. Defendant, Eldercare Insurance Services Inc. (“Eldercare”), has designated Billy Williams of the law firm of Gordon Rees Scully Mansukhani, LLP, 221 W. Second Street, Little Rock, AR 72201, telephone number (501) 801-1923 to serve as its local counsel in this matter.
2. Eldercare has also retained and designated the law firm of King & Spalding LLP, 353 N. Clark St., 12th Floor, Chicago, IL 60654, telephone number (312) 995-6333 as national counsel.
3. Livia M. Kiser, a partner with King & Spalding LLP, is a member of and in good standing with the Bar of the State of Illinois and is admitted to practice before the Illinois state courts and the United States District Courts for the Northern and Southern Districts of Illinois, among others.

4. Ms. Kiser requests leave to appear in this action on behalf of defendant Eldercare Insurance Services, Inc. and agrees to abide by the rules of this Court and to submit to disciplinary procedures applicable to Arkansas lawyers.

WHEREFORE, Livia M. Kiser respectfully moves this court to enter an order authorizing her to appear and participate in this action for the purpose of representing Integrity Marketing Group LLC, and for all other proper relief.

Respectfully submitted this 16th day of March, 2020.

/s/ Livia M. Kiser

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/s/ Billy Williams

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Counsel for Defendant Eldercare Insurance Services Inc.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been filed on this 16th day of March, 2020, using the Court's CM/ECF electronic filing system, which will provide service to the following counsel of record:

Stefan Coleman
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Counsel for Plaintiff

s/ Billy Williams

Billy Williams